

## **EXHIBIT 3**

Tuesday, March 5, 2024 at 19:31:35 Eastern Standard Time

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**Subject:** Re: Gideon Rapaport  
**Date:** Tuesday, August 2, 2022 at 3:24:29 PM Eastern Daylight Time  
**From:** Zach Garrett  
**To:** Peter Redpath, Kate Beer Alcantara  
**Attachments:** Security Desk Photo.jpeg, TopLawSchools Thread.pdf, Reddit LawSchool Thread.pdf

Hello Peter and Kate,

As I mentioned to you over the weekend, my understanding is that Gideon Rapaport was fired from his summer associate position at Kirkland & Ellis NY last week for sexually harassing a practice assistant or an attorney. Please see the attached forum threads ("TopLawSchools Thread" and "Reddit LawSchool Thread"), each of which are in reference to Gideon's behavior and firing. Here are hyperlinks to the [TopLawSchools thread](#) and to the [Reddit thread](#). While I cannot confirm the sexual harassment claim specifically, I do know that Gideon was fired and banned from entering the building. Please see the attached photo ("Security Desk Photo") taken by Ajay Iyer at Kirkland & Ellis's New York location at 601 Lexington Avenue on Thursday, June 28th, where Ajay worked with Gideon this summer.

After getting back from the conference, I spoke with Richard Epstein about this situation. He's understandably very upset by the news and feels that Lee Otis should be made aware, since Gideon is going to be participating in the James Kent Fellowship, for which Professor Epstein wrote Gideon a (complicated) letter of recommendation. I don't know Lee Otis, though, so I'm sharing with you two Professor Epstein's concerns. If you feel Lee Otis should know, could you please notify her? If not, I understand. I simply felt it would be more appropriate to come from one or both of you rather than myself.

If you'd like to discuss further, please let me know.

Thank you,  
**Zachary G. Garrett**  
J.D. Candidate | Class of 2023  
New York University School of Law



r/LawSchool

## Posts



236



Posted by u/Isa931 4 days ago



Anyone wanna spill the tea on the summer at Kirkland NY that got fired?

Give the people what they want!!



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 u/Meet\_Tally · Promoted

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Neglecting their readings



Created Oct 29, 2009

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RAPAPORT0003

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Throaway9219749936 · 3 days ago

Can confirm that he is in fact banned from the building- security had a picture of him in the lobby. Also the bar where the last event of the summer was had a picture of him as well to make sure he didn't come back. Same guy who went around the office celebrating the Dobbs ruling.

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Isa931 **OP** · 3 days ago

Heard about the dobbs thing also! Damn this guy sounds like a menace.

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mroctober1010 · 4 days ago

someone please respond to this comment if the tea is spilled

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aliceandskittles · 4 days ago

JD

Could you please link the post? I can't find it lol

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stev3nguy · 3 days ago

I'm out of the loop. What's this about?

↑ 24 ↓ Reply Share Report Save Follow

InarticulateL · 4 days ago

Is this about the other poster? How do you know it was Kirkland?

 66   Reply Share Report Save Follow

BrownComic · 4 days ago

Guy also sexually harassed an attorney. No longer allowed in the building.

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Isa931 OP · 4 days ago

Got it confirmed from someone inside but didn't get specifics. Just that they said racist shit

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haikusbot · 4 days ago

*Is this about the**Other poster? How do you**Know it was Kirkland?*

- InarticulateL

I detect haikus. And sometimes, successfully. [Learn more about me.](#)

Opt out of replies: "haikusbot opt out" | Delete my comment: "haikusbot delete"

 89   Reply Share Report Save Follow
[Continue this thread →](#)cvrline · 4 days ago · *edited 4 days ago*

lol several NY big law summers didn't get offers, (I've heard of 4 in the past week, because of people being dumb, I'm sure there will be more) it happens every summer, don't get too drunk at summer events y'all, it happens all over

Isa931 [OP](#) · 3 days ago

Yeah but this guy didn't get no-offered. He got straight up fired.

25 [Reply](#) [Share](#) [Report](#) [Save](#) [Follow](#)

Time-Elephant92 · 3 days ago

2L

If you don't know your limits, a social networking event isn't the time to test it

8 [Reply](#) [Share](#) [Report](#) [Save](#) [Follow](#)

Consistent-Career305 · 3 days ago

All at kirkland? Or more broadly

3 [Reply](#) [Share](#) [Report](#) [Save](#) [Follow](#)

FightMilkDrinker · 19 hr. ago

Can anyone send a link for some context?

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[Marginalimprovent](#) · 3 days ago

[New-Loan5393](#) · 3 days ago

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Posted by [u/ClassicalGrey](#) 3 days ago

533 **My software cut out the rest of the gif, where Mr. Burns then throws the paper shreds out the window**

year and being instantaneously available and generating great work product. However, you were \*not\* present and accounted for for the Margarita Wednesday mixers in July and August. This is a serious black mark against your future career prospects here are Kirkland & Ellis. We demand participation in Margarita Wednesday mixers. Therefore, your bonus this year is \$0. Thank you, however, for your millions in revenue. Long live Margarita Wednesdays."

Anonymous User

Posts: 407167  
Joined: Tue Aug 11, 2009 8:32 am

Re: Kirkland Megathread

by Anonymous User » Tue Jul 26, 2022 10:42 am



So it looks like they are monitoring, or there's a trend towards monitoring, in NYC, DC, and SF. But no, I'm sure it's an "urban legend" some of us are making up because we're just paranoid or incapable of reading social cues. ■

Anonymous User

Posts: 407167  
Joined: Tue Aug 11, 2009 8:32 am

Re: Kirkland Megathread

by Anonymous User » Thu Jul 28, 2022 5:18 pm



Rumors of a NY summer who got fired?

Anonymous User

Posts: 407167  
Joined: Tue Aug 11, 2009 8:32 am

Re: Kirkland Megathread

by Anonymous User » Fri Jul 29, 2022 3:49 pm



“ Anonymous User wrote: ↑ Thu Jul 28, 2022 5:18 pm  
Rumors of a NY summer who got fired?

I'm also checking in to see if the ny associates will spill

Anonymous User

Posts: 407167  
Joined: Tue Aug 11, 2009 8:32 am

Re: Kirkland Megathread

by Anonymous User » Fri Jul 29, 2022 4:40 pm



“ Anonymous User wrote: ↑ Fri Jul 29, 2022 3:49 pm  
“ Anonymous User wrote: ↑ Thu Jul 28, 2022 5:18 pm  
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Anonymous User

Posts: 407167  
Joined: Tue Aug 11,

Re: Kirkland Megathread

by Anonymous User » Fri Jul 29, 2022 6:54 pm



2009 8:32 am

Anonymous User

Posts: 407167  
Joined: Tue Aug 11, 2009 8:32 am

Re: Kirkland Megathread

by Anonymous User » Sat Jul 30, 2022 12:13 am

Kirkland summers get PAs? For what lol



Anonymous User

Posts: 407167  
Joined: Tue Aug 11, 2009 8:32 am

Re: Kirkland Megathread

by Anonymous User » Sat Jul 30, 2022 7:07 am

Anonymous User wrote: ↑  
Kirkland summers get PAs? For what lol



Same Kirkland summer from above. It's literally just so we get the experience and begin getting used to having a PA. i only ever used mine to file expense reimbursements.

Anonymous User

Posts: 407167  
Joined: Tue Aug 11, 2009 8:32 am

Re: Kirkland Megathread

by Anonymous User » Sat Jul 30, 2022 11:32 am

Anonymous User wrote: ↑  
Kirkland summers get PAs? For what lol



the PAs are assigned summers so they can train with them before they get assigned 1st years in the fall

sidebar: the gifts given to summers this year were atrocious. almost everything went straight to goodwill

thisismytsuerna  
me



Posts: 192  
Joined: Wed Dec 20, 2017 9:22 pm

Re: Kirkland Megathread

by thisismytsuerna » Sat Jul 30, 2022 11:36 am

Anonymous User wrote: ↑  
Kirkland summers get PAs? For what lol



the PAs are assigned summers so they can train with them before they get assigned 1st years in the fall

sidebar: the gifts given to summers this year were atrocious. almost everything went straight to goodwill

What gifts?

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## Kirkland Megathread Forum

### Forum rules

#### Anonymous Posting

Anonymous posting is only appropriate when you are revealing sensitive employment related information about a firm, job, etc. You may anonymously respond on topic to these threads. Unacceptable uses include: harassing another user, joking around, testing the feature, or other things that are more appropriate in the lounge.

Failure to follow these rules will get you outed, warned, or banned.

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511 posts



1

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17

18

19

20

21

**Anonymous User**

Posts: 407167  
Joined: Tue Aug 11,  
2009 8:32 am

### Re: Kirkland Megathread

by **Anonymous User** » Sat Jul 30, 2022 11:36 am



“ **Anonymous User** wrote: ↑

Fri Jul 29, 2022 4:40 pm

“ **Anonymous User** wrote: ↑

Fri Jul 29, 2022 3:49 pm

“ **Anonymous User** wrote: ↑

Thu Jul 28, 2022 5:18 pm

Rumors of a NY summer who got fired?

I'm also checking in to see if the ny associates will spill

Anon bc im a Kirkland summer but the guy apparently harassed his PA and also was the same person who purposely went to female SA to celebrate the Dobbs decision.

Did you summer in NY? More context to your use of apparently please. Trying to figure out if there's anyone that can definitively say

RAPAPORT0009

this occurred. Did you hear it from another summer or are there legitimate clues (E.g., this person's absence from an offer reception or events, comments from recruiting or associates, having witnessed this rumored note instructing security not to let him in)?

Last edited by [Anonymous User](#) on Sat Jul 30, 2022 11:39 am, edited 1 time in total.

**Anonymous User**

Posts: [407167](#)  
Joined: Tue Aug 11, 2009 8:32 am

**Re: Kirkland Megathread**

by [Anonymous User](#) » Sat Jul 30, 2022 11:38 am



**Anonymous User wrote:** ↑ Sat Jul 30, 2022 11:32 am

**Anonymous User wrote:** ↑ Sat Jul 30, 2022 12:13 am  
Kirkland summers get PAs? For what lol

the PAs are assigned summers so they can train with them before they get assigned 1st years in the fall

sidebar: the gifts given to summers this year were atrocious. almost everything went straight to goodwill

What office were you in? I agree. In Chicago we were given some clunky shoes from a company I had never heard of, a Kirkland cap, a black water bottle, and a tote bag from career link.

**Anonymous User**

Posts: [407167](#)  
Joined: Tue Aug 11, 2009 8:32 am

**Re: Kirkland Megathread**

by [Anonymous User](#) » Sat Jul 30, 2022 12:08 pm



**Anonymous User wrote:** ↑ Sat Jul 30, 2022 11:36 am

**Anonymous User wrote:** ↑ Fri Jul 29, 2022 4:40 pm

**Anonymous User wrote:** ↑ Fri Jul 29, 2022 3:49 pm

**Anonymous User wrote:** ↑ Thu Jul 28, 2022 5:18 pm  
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RAPAPORT0010

I used "apparently" because the reason he was fired I only heard from a fellow summer. I did however personally see his picture in the lobby security and at the bar where the final summer event was held the door people had a photo of him as well with instructions not to let him in.

Anonymous User

Posts: 407167  
Joined: Tue Aug 11, 2009 8:32 am

Re: Kirkland Megathread

by Anonymous User » Sat Jul 30, 2022 1:59 pm



Anonymous User wrote: ↑  
Fri Jun 24, 2022 10:52 pm  
K&E partner here. Share partner, fwiw.

We didn't fire Clement. We told Clement that he should not take on any more 2A representations going forward. I'm not aware of any particular client(s) demanding that the firm step away from these, but there are many of us here who believe the tragedy in Uvalde is a tipping point and we cannot in good faith as a firm continue to advocate for clients that contribute to this shit always happening in our country.

Clement decided (as is his right) that he didn't want the firm telling him which clients, no matter how unpopular they or their goals might be, he could represent. He is a great lawyer and we aren't happy to see him go. But telling him that he couldn't do one specific type of representation is not "constructive firing", as much as K&E haters like "Kirkland Signature" would have you believe.

Leadership in this firm still leans right. But this "Wal-mart of law firms" with no principles other than just making money has a collective belief that kids should not get gunned down in schools. There are many on the right who believe sensible gun control is the right thing to do, and as a firm we have decided we are not going to represent the 2A zealots who fight tooth and nail against any and all forms of it.

Regardless of the merits, K&E obviously knew that this was constructively firing Clement. After all, the exact same thing happened to King & Spalding. Especially since he was guaranteed free rein when Kirkland acquired Bancroft.

Anonymous User

Posts: 407167  
Joined: Tue Aug 11, 2009 8:32 am

Re: Kirkland Megathread

by Anonymous User » Sat Jul 30, 2022 9:50 pm



Anonymous User wrote: ↑  
Sat Jul 30, 2022 1:59 pm

Anonymous User wrote: ↑  
Fri Jun 24, 2022 10:52 pm  
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Regardless of the merits, K&E obviously knew that this was constructively firing Clement. After all, the exact same thing happened to King & Spalding. Especially since he was guaranteed free rein when Kirkland acquired Bancroft.

Yeah this mealy mouthed "we didn't fire him" is so cowardly, at least have the courage of your convictions.

#### Anonymous User

Posts: 407167  
Joined: Tue Aug 11,  
2009 8:32 am

#### Re: Kirkland Megathread

by **Anonymous User** » Sat Jul 30, 2022 11:34 pm



“ Anonymous User wrote: ↑ Sat Jul 30, 2022 11:36 am

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RAPAPORT0012

please. Trying to figure out if there's anyone that can definitively say this occurred. Did you hear it from another summer or are there legitimate clues (E.g., this person's absence from an offer reception or events, comments from recruiting or associates, having witnessed this rumored note instructing security not to let him in)?

This stuff gets around. I've seen a picture of the security note, much to my amusement (and I'm at a different firm in another market).

Anonymous User

Posts: 407167  
Joined: Tue Aug 11, 2009 8:32 am

Re: Kirkland Megathread



by Anonymous User » Sun Jul 31, 2022 6:32 pm

There's a thread titled "Which partners at your firm are notoriously terrible to work for?" and I was hoping someone from K&E RX could chime in (here or in that thread). I've asked in that thread before but haven't gotten a response. Hopefully someone will chime in about NSPs/SPs that are notoriously terrible to work for. Thanks!

Anonymous User

Posts: 407167  
Joined: Tue Aug 11, 2009 8:32 am

Re: Kirkland Megathread



by Anonymous User » Mon Aug 01, 2022 9:42 am

What the fuck is this PTET bullshit? I just got an email from Kirkland that I owe them \$20k and I haven't worked there in over a year.

Anonymous User

Posts: 407167  
Joined: Tue Aug 11, 2009 8:32 am

Re: Kirkland Megathread



by Anonymous User » Mon Aug 01, 2022 9:47 am

Anonymous User wrote: ↑  
Mon Aug 01, 2022 9:42 am  
What the fuck is this PTET bullshit? I just got an email from Kirkland that I owe them \$20k and I haven't worked there in over a year.

Wait - what is this? What is PTET? Is this like a signing bonus claw-back or something?

Anonymous User

Posts: 407167  
Joined: Tue Aug 11, 2009 8:32 am

Re: Kirkland Megathread



by Anonymous User » Mon Aug 01, 2022 11:26 am

Anonymous User wrote: ↑  
Mon Aug 01, 2022 9:42 am  
What the fuck is this PTET bullshit? I just got an email from Kirkland that I owe them \$20k and I haven't worked there in over a year.

Got to get your accountant involved, show them your K1.

Anonymous User

Posts: 407167

Re: Kirkland Megathread



by Anonymous User » Mon Aug 01, 2022 11:57 am